

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IAN ANDREW BOWMAN,
Plaintiff,

v.

CITY OF CHICAGO and
UNKNOWN CHICAGO POLICE
OFFICERS,
Defendants.

No.

JURY DEMANDED.

COMPLAINT

Plaintiff Ian Andrew Bowman alleges as follows:

1. This is a civil action arising under 42 U.S.C. § 1983. The jurisdiction of this Court is conferred by 28 U.S.C. § 1343 and § 1367.
2. Plaintiff is a resident of this judicial district.
3. Defendant City of Chicago is a municipal corporation with its principal office in this judicial district.
4. Defendant City of Chicago employs a force of police officers who act under color of law by and through its Chicago Police Department.
5. On May 31, 2020, plaintiff joined a peaceful protest against police brutality near the intersection of Clark and Hubbard Streets in Chicago.
6. At said time and place, while plaintiff was peacefully assembled, defendants Unknown Chicago Police Officers set upon him and began clubbing, beating, choking, kicking, and stomping on him without legal justification.
7. At all relevant time periods, defendants Unknown Chicago Police Officers were acting under color of law and within the scope of their employment

with defendant City of Chicago.

8. The conduct of defendants Unknown Chicago Police Officers in beating, punching, choking, kicking, and stomping on the face was done in violation of plaintiff's Fourth Amendment right to be free from unreasonable seizures.

9. Plaintiff asserts federal claims against defendants Unknown Chicago Police Officers.

10. Plaintiff additionally asserts a state law claim against defendant City of Chicago based on the doctrine of respondeat superior for battery. Plaintiff also joins the City of Chicago as the indemnitor of the individual officers on plaintiff's federal claims.

11. Plaintiff demands trial by jury.

WHEREFORE plaintiff requests that judgment be entered in his favor and against defendant City of Chicago.

By: /s/ John K. Kennedy
JOHN K. KENNEDY
DANIEL WATKINS, II
Kennedy Watkins LLC
One North State Street, Suite 1500
Chicago, IL 60602
(312) 448-8181
jkennedy@kwlawchicago.com
dwatkins@kwlawchicago.com